

ROTTENBERG LIPMAN RICH, P.C.

NEW JERSEY OFFICE
PARK 80 WEST, PLAZA ONE
250 PEHLE AVENUE, SUITE 101
SADDLE BROOK, NEW JERSEY 07663
TELEPHONE (201) 490-2022
TELECOPIER (201) 490-2040

THE HELMSLEY BUILDING
230 PARK AVENUE
EIGHTEENTH FLOOR
NEW YORK, NEW YORK 10169
TELEPHONE (212) 661-3080
TELECOPIER (212) 867-1914

WWW.RLRPCLAW.COM
BERTRAND C. SELLIER
MEMBER
BSELLIER@RLRPCLAW.COM

March 31, 2020

BY ECF

Hon. Valerie E. Caproni
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: Alex Goldfarb v. Channel One Russia and RT America
a.k.a. Ano TV-Novosti
Index No.: 18-CV-08128 (VEC)

Dear Judge Caproni:

We represent plaintiff Alex Goldfarb in the above- referenced action. All of the parties join in this report.

Defendants Channel One Russia ("Channel One") and RT America a.k.a. Ano TV-Novosti ("RT America") have moved for reconsideration, or in the alternative certification, of the Court's Opinion and Order dated March 4, 2020. We have agreed, subject to the Court's approval, to defer jurisdictional discovery as to RT America, and merits discovery as to Channel One, until the Court resolves defendants' pending motions.

Channel One has also proposed that we defer merits discovery as to Channel One until the resolution of RT America's pending motion to dismiss. We have informed Channel One's counsel that we will consider that proposal once the Court has resolved the pending motions.

Respectfully,



Bertrand C. Sellier

BCS:als
3365

cc: Matthew Ledicotte, Esq. (via email)
Johnathan New, Esq. (via email)